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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SCOTT KOLLER, on behalf of himself, the
general public and those similarly situated,

Plaintiff,

v.

MED FOODS, INC., AND DEOLEO USA,
INC.

Defendants.

CASE NO. 14-cv-2400 (RS)

**DECLARATION OF HASSAN A.
ZAVAREEI IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: May 10, 2018

Time: 1:30 p.m.

Courtroom 3, 17th Floor

Judge: Hon. Richard Seeborg

I, Hassan A. Zavareei, hereby declare as follows:

1. I am competent to testify to the matters stated herein. I submit this declaration in
support of Plaintiff's Motion for Certification of a Settlement Class and Preliminary Approval of
Class Action Settlement.

2. I am a partner at the firm Tycko & Zavareei LLP and a member in good standing of
the District of Columbia, Maryland and California bars. Over the past twenty years, I have gained
substantial experience handling complex civil litigation and class action litigation. I have taken
several cases to trial, including jury trials that have lasted several months. I have argued appeals
in both the D.C. Circuit and the Fifth Circuit. I am a graduate of Boalt Hall Law School at the
University of California, Berkeley.

3. Attached hereto as Exhibit A is an updated copy of the Tycko & Zavareei LLP firm
résumé, containing additional information on myself, our firm, and the other attorneys from my

1 firm who worked on this matter.

2 4. To date, my firm has worked over 850 hours on this case, and my firm has incurred
3 approximately \$50,000.00 in unreimbursed expenses. These totals will continue to increase up to
4 and through final settlement approval.

5 5. Based on my reasoned judgment, and for the reasons set forth in the Declaration of
6 my co-counsel Adam Gurtide, I believe the proposed settlement is fair and reasonable.

7 On this 3rd day of April, 2018, I declare under penalty of perjury under the laws of the
8
9 United States of America that the foregoing is true and correct.

10 /s/ Hassan Zavareei
11 Hassan A. Zavareei (*pro hac vice*)
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